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January 29, 2025

BY CM/ECF

The Honorable Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Carroll v. Trump, 20 Civ. 7311 (LAK)
Carroll v. Trump, 22 Civ. 10016 (LAK)

Dear Judge Kaplan,

We write to update the Court. Pursuant to the orders entered on August 9, 2024, approving stipulations that substituted Kaplan Martin LLP for Hecker Fink LLP in the captioned actions (the “Actions”), Kaplan Martin and Hecker Fink submitted letters on October 8 and 9, 2024, describing their respective positions with respect to the charging liens asserted by Hecker Fink in the Actions.

In its letters, Hecker Fink requested a ruling formally recognizing the liens. That request remains pending. Kaplan Martin and Hecker Fink (the “Firms”) have since conferred further and have agreed upon a process for determining, at the appropriate time, any amounts due to Hecker Fink. Accordingly, Hecker Fink respectfully withdraws its request for formal recognition of the liens, without prejudice to a subsequent application to enforce the Firms’ agreement with respect to the liens in the unlikely event that such an application should prove to be necessary.

Respectfully Submitted,



Shawn G. Crowley, Esq.
Michael Ferrara, Esq.
Joshua Matz, Esq.

cc: Counsel of Record (by ECF)